



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

September 27, 2012

Patti Bailey, Project Officer
Confederated Tribes of the Colville Reservation
1 Colville Street
PO Box 150
Nespelem, Washington 99155

RE: Support Agency Cooperative Agreement No. V97084401

Dear Ms. Bailey:

On September 25, 2012, the U.S. Environmental Protection Agency, Office of Environmental Cleanup, conducted a programmatic review of your Cooperative Agreement via teleconference. This review was conducted by Helen Bottcher as part of a post-award monitoring effort. Cindy Marchand and Erica de Leon represented the Confederated Tribes of the Colville Reservation in the review. I appreciate the time and effort your staff took to prepare for and participate in the discussion. It is our hope that this effort will assist the Tribes in effectively managing this assistance agreement and maintain an open dialogue between the EPA and your organization.

The results of our review are enclosed and reflect significant efforts over the past year by the Tribes to support involvement in the EPA's activities at the Upper Columbia River site and to effectively track and manage resources provided through the cooperative agreement.

If you or members of your Comptroller's office have any questions about this review, please feel free to contact me at (509) 376-8631.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Faulk", is written over a horizontal line.

Dennis Faulk, Program Manager
Hanford Project Office

cc: Helen Bottcher, Bob Phillips and Ricardo Solis, EPA (by email only)
Cindy Marchand and David Osenga, CCT (by email only)

Enclosure

**Support Agency Cooperative Agreement (SACA)
Confederated Tribes of the Colville Reservation
Upper Columbia River Superfund Site Support
Cooperative Agreement Number 97084401**

Purpose of Review:

Advanced Post Award Monitoring

Describe the grant work-plan commitments:

The grant provides funding for the Confederated Tribes of the Colville Reservation (Tribes) to provide tribal representation and government-to-government involvement in EPA's investigation of environmental contamination at the Upper Columbia River site. EPA is overseeing a Remedial Investigation / Feasibility Study (RI/FS) under the terms of a 2006 Settlement Agreement between EPA and Teck Cominco. The Settlement Agreement includes funding for the participation of the Tribes and other affected governments. Funding for the Tribes is provided through this Cooperative Agreement. This funding allows the Tribes to review technical documents developed as part of the investigation, participate in planning and technical review meetings, observe field sampling activities, and help EPA comply with cultural resource protection requirements under the National Historic Preservation Act.

In addition to active participation in the RI/FS process, the Tribes have assisted EPA's investigation by helping design and implement a survey of households on the reservation in order to determine Tribal exposure pathways at the Site for the Human Health Risk Assessment. The Tribes' costs for this survey are funded through this Cooperative Agreement.

Discuss previous recommendations if any exist:

No previous recommendations exist.

Program Synopsis: Address all of the areas that apply to the agreement.

(see Table below)

Program Synopsis	<u>Yes</u>	No <u>(Please provide detail)</u>	<u>N/A</u>
<p>Work under the grant is progressing as planned. The Tribes completed the planned survey work on schedule and continue to be actively engaged in the RI/FS process.</p>			
<p>Is payment history consistent with progress to date?</p>		<p>No. The Tribes are currently behind in billing, but they are working get outstanding invoices prepared and submitted. The Tribes will submit all outstanding invoices before the end of December 2012. In 2013, the Tribes will shift from quarterly billing to monthly billing, which will ensure that payments keep up to date with expenditures and allow both the Tribes and EPA to better track and plan costs under the agreement.</p>	
<p>Is the work under the agreement on schedule?</p>	Yes	.	

Is the actual work being performed within the scope of the recipient's work plan?	Yes		
Are the recipient's staff and facilities appropriate to handle the work under the agreement?		In the past, the Tribes' accounting department was unable to produce invoices in a timely manner and a backlog of accounting and billing work developed. Several steps have been taken by the Tribes to address this issue, including the hiring of an accountant within the Environmental Trust Department and the hiring of additional personnel to fully staff the Tribes' central accounting department. These added resources, along with a new accounting system put in place last year should give the Tribes all the tools they need to effectively track and manage the grant.	
Are the products/progress reports submitted on time?	Yes		

Are the products/progress reports acceptable?	Yes		
Is the recipient making adequate progress in achieving outcomes and outputs and associated milestones in the assistance agreement workplan?	Yes		
If the recipient is experiencing significant problems meeting agreed-upon outcomes and outputs, has the recipient been required to develop and implement a corrective action plan?			N/A
Has the recipient complied with the programmatic terms and conditions on the award?	Yes		

Did the recipient purchase equipment/property as planned in the agreement?			N/A
Has the equipment been used as planned in the agreement?			N/A
Does this review indicate any need to amend the award?		There is no need to amend this award. This agreement ends September 30, 2012 and will be closed out by the end of December, 2012. EPA recently completed the award of a new agreement with the Tribes that will replace the current agreement. The Tribes will begin charging against the new agreement on October 1, 2012.	
If this award includes sub-awards, is the recipient complying with the sub-award policy requirements?			N/A